

## REMARKS

Claims 1-6, 8-14 and 16-19 are pending in the application, and were all rejected as being anticipated by Pirolli et al. (U.S. Patent No. 5,895,470):

### **35 U.S.C. §102(e) Anticipation of Claims 1-6, 8-14, 16-19 by Pirolli**

5        1. *Pirolli does not anticipate the present invention because it fails to teach the element of a similarity measure calculated between a starting document and each other document with document symbols displayed by a computer graphical display being augmented by a marking dependent on the calculated measure of similarity.*

10        The Examiner, in the OA, p. 3, states that Pirolli discloses a computer system comprising a processor, a pointing device and a graphic display (Fig. 14), and further discloses a software tool or browser (col. 6, lines 4-26) which enables a user to traverse through and view documents residing on the Web. The Examiner further states that Pirolli also identifies and categorizes document according their

15 similarities related to the focus document or starting document (see Abstract, col. 10, lines 17-29). The Examiner states that Fig. 7 also shows an asymptotic pattern activation over nodes or symbols illustrated or characterized by graph bars 704 contained in the nodes at activated network 703, and that thus, the characteristic given to said node defines the degree of predicted relevance of web pages to the

20 starting set of focus web pages (col. 10, lines 17-29). The Examiner further states that Pirolli clearly discloses measure of similarity of a starting document to a plurality of other documents using a dot product method (see Fig. 4, col 7, lines 49-63, and elsewhere).

The Examiner then states that Pirolli further discloses a graphical

visualization of ionic [sic: iconic] representations of a search result including each icon having its own characteristic. This is a contrary position to that taken by the Examiner in the Office Action dated April 2, 2003 on page 3, where the Examiner stated that Pirolli discloses a graphical display program (web browser), but does not explicitly show the visualization aspect or in claim language "display respective symbols of said other documents". In this prior Office Action, the Examiner then applied the Hoppe reference in combination with Pirolli to reject the claims.

The Examiner has rejected the method claim 10 under the same rationale.

The Examiner had previously indicated that the display of "respective symbols of said other documents" is not explicitly shown in Pirolli.

The strength associations of Pirolli are displayed in the links between documents and not within the documents themselves; Pirolli does not focus on a relationship to a central document for display purposes.

According to Pirolli, "[representations constructed include] Graph representations of the strength of association of Web pages to one another which are used in the spreading activation..." 5/66 - 6/1. The display of these representations of strength of association are described in Pirolli, referring to Fig. 10, as being "the widths of the lines connecting the various pages 1001-1007 [which] is an indication of how similar the pages are." 11/13-15. Thus, Pirolli's display focuses on a between-document relationship and does not utilize the concept of a starting document for display purposes.

Claim 1 of the present invention requires, in part, that, a similarity measure between a starting document and each other document is calculated and that the document symbols are augmented by a marking dependent on the calculated measure of similarity. An exemplary embodiment of this display can be seen in Fig.

1 in which the degree of relationship of documents to the starting document is represented by the shading used on the document itself. This is different from Pirolli because the present invention permits the simultaneous display of a structure of links and a structure of similarities belonging to the same originating document within a common representation of both link structure and similarity structure. Pirolli does not provide such a simultaneous display, nor could it be modified to produce such a display as it's display does not focus on a single starting document.

Fig. 7 of Pirolli is not a computer display, but is an illustrative diagram. Pirolli states, "Spreading activation across the networks is described conceptually with reference to Fig. 7" 10/17-18. There is no computer generation and display of what is shown in Fig. 7, and therefore, the document symbols cannot be augmented by a marking dependent on the calculated measure of similarity. The type of output described by Pirolli relates to matrices. Pirolli states, at 10/50-58:

As outlined above, three kinds of graphs, or networks, are used to represent strength of associations among web pages.... Each of these networks or graphs is represented by matrices in our spreading activation algorithm.

The only types of visualizations addressed by Pirolli are described at 12/58-13/13, and do not include the augmentation of a document symbol by a marking dependent on the calculated measure of similarity from a starting document.

20 And even if it, solely for the sake of argument, Pirolli did formulate some sort of display based on this, Pirolli discusses this with respect to a set of focus Web pages, not a starting document. 10/26.

In the event the rejection is maintained, the Examiner is asked to specifically indicate what element either in the figures or disclosure of Pirolli illustrates the display of the similarity measure according to a computer which comprises a

graphical display.

For the above reasons, Applicant respectfully contends that the present invention is not anticipated by Pirolli and respectfully requests that the 35 U.S.C.


• §102 rejection be withdrawn from the application.

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## CONCLUSION

Inasmuch as each of the objections have been overcome by the cancellation of claims and discussion presented above, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that this application be passed to issue.

Respectfully submitted,

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